

Pro Se 1 (Rev. 12-16) Complaint for a Civil Case

FILED
RICHARD W. NAGEL
CLERK OF COURT21 JUN 14 PM 3:45
U.S. DISTRICT COURT
SOUTHERN DIST OHIO
WEST DIV CINCINNATI

UNITED STATES DISTRICT COURT

for the

United States District of Ohio

Southern Division

Case No.

1:21CV404*(to be filled in by the Clerk's Office)*Jury Trial (check one) ☒ Yes ☐ No**L. DEOTT****M. J. BOWMAN**Bob George, *Plaintiff*
Nancy George, *Plaintiff**Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

STRATA TRUST, Company
Vault Metal*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Mr. and Mrs. Bob and Nancy George
Street Address	7776 Hardin Street NW
City and County	Massillon
State and Zip Code	Ohio, 44646
Telephone Number	330-854-5761
E-mail Address	nmg7776@aol.com

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B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	Strata Trust Company
Job or Title <i>(if known)</i>	Attention: Registered Agent
Street Address	7901 Woodway Drive
City and County	Waco
State and Zip Code	Texas 76712
Telephone Number	866-962-7657
E-mail Address <i>(if known)</i>	busdev@stratatrust.com

Defendant No. 2

Name	Vault Metal, Attn: Nadine Lewis Esq
Job or Title <i>(if known)</i>	Attorney of Record for "Vault Metal, LLC"
Street Address	1531 6 th Street, Suite # 303
City and County	Santa Monica
State and Zip Code	California 90401
Telephone Number	424-330-0386
E-mail Address <i>(if known)</i>	nadine@nadineesq.com

Defendant No. 3

Name	John Doe (1-100)
Job or Title <i>(if known)</i>	TBD
Street Address	TBD
City and County	TBD
State and Zip Code	TBD
Telephone Number	TBD
E-mail Address <i>(if known)</i>	TBD

Defendant No. 4

Name	Jane Doe (1-100)
Job or Title <i>(if known)</i>	TBD
Street Address	TBD
City and County	TBD
State and Zip Code	TBD
Telephone Number	TBD

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E-mail Address (if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply.)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Mr. and Mrs. Robert George, is a citizen of the State of (name) Ohio.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

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The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b If the defendant is a corporation

The defendant, *(name)* Strata Trust Company, is incorporated under
the laws of the State of *(name)* _____, and has its
principal place of business in the State of *(name)* California.
Or is incorporated under the laws of *(foreign nation)* _____,
and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3 The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*,

The Amount in Controversy is \$ 100,000.00, which takes into account the following:

- 1 Cost of Initial Investment
- 2 Legal Fees
- 3 Losses
- 4 Time spent working on this matter
- 5 Pain and Suffering
- 6 Damages

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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The "Plaintiffs" in this action make the following Claims for Relief

1. Strata Trust Company , failed the "Plaintiffs" by Failing to Properly Advise and Protect the "Plaintiffs" as there Custodian in the IRA Rollover / Transfer and Purchase of "Precious Metals" with Vault Metals
2. Strata Trust Company , failed to Disclose there Fee's and Commissions to the "Plaintiffs"
3. Strata Trust Company , did send the "Plaintiffs" money to "Vault Metal" without the "Plaintiffs" knowing or approving what they where in fact purchasing This Transfer was sent without there approval.
4. Strata Trust Company , failed to Inform or Instruct the "Plaintiffs" that they had a Limited to Zero Knowledge or Transaction History with Vault Metal and in fact made the "Plaintiffs" believe they had a Long Standing Business History when they didn't
5. Vault Metal failed to get the "Plaintiffs" Approval and Consent Prior to making any Purchases.
6. Vault Metal used "High Pressure" Sales Tactics and Deceptive Business Practices to Trick the "Plaintiffs" into putting there Faith and Trust into Vault Metal
7. The "Plaintiffs" have repeatedly asked Vault Metal for what was Purchased and what the Commissions and Fees where on the Puchase and they have Refused They got there Lawyer involved in the matter who treated the "Plaintiffs" with Complete Disrespect and with Agression and Threats.
8. The "Plaintiffs" believe they where targeted by Vault Metal because they are Seniors and considered easy Targets.
9. The "Defendants" Violated the Consumer Protection Act and operated using Deceptive Business Practices and did so for the Sole Purpose and Benefit of not Disclosing there Fees and Pilfering the Money and Assets of the "Plaintiffs"

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The "Plaintiffs" are seeking Relief in the Amount of \$100,000.00 in this action to bring Justice and Resolution. They where Victimized using High Pressure Tactics and Deceptive Practices to convince them to Trust the "Defendants"

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing. 6/10/21

Signature of Plaintiff

Printed Name of Plaintiff

Bob George

Bob George

B. For Attorneys

Date of signing. _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**Additional Page
Additional Information , Page 4 Section (b)**

Defendant (#1) is :

Strata Trust Company , that has a Principal Place of Business in the State of California

Defendant (#2) is :

Vault Metal Company , that has a Principal Place of Business In the State of California

June 10, 2021

To:

**United States District Court
Southern District of Ohio
Attn: Clerk of the Court
100 East Fifth Street , Room # 103
Cincinnati, Ohio 45202**

From:

**Mr. Bob George
Mrs. Nancy George
7776 Hardin Street NW
Massillon Ohio 44646**

Subject: Documents Closed , US Federal Court Filings

To Whom It May Concern:

The enclosed Documents need to be filed in a "New Case Filing" in the Southern District of Ohio. Please file these documents and send a "Stamped Copy" back to us we are included a self-addressed envelope.

We are sending the \$ 402.00 filing fee out today in a Separate Letter.

Sincerely,

Mr. and Mrs. George